

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: MARTHA BELL, ) 18-23089 GLT  
 )  
Debtor. ) Chapter 13  
 )  
RONDA J. WINNECOUR, ) Docket No. 46  
CHAPTER 13 TRUSTEE, ) Rel. To Docket No. 45  
 )  
Movant, )  
 ) Hearing Date & Time: 4/10/19  
vs. ) at 11:00 a.m.  
 )  
MARTHA BELL, )

**DEBTOR'S RESPONSE TO THE CHAPTER 13 TRUSTEE'S  
ORAL MOTION TO DISMISS THE CASE**

AND NOW, come the Debtor, by and through her attorney, Rodney D. Shepherd, who respectfully represents the following:

1. On or about August 2, 2018, Debtor filed a bankruptcy for protection under Chapter 13 of the U.S. Bankruptcy Code.

2. Debtor is the owner of certain residential property located at 204 Castle Drive, West Mifflin, PA 15122.

3. The filing of the Chapter 13 Bankruptcy was for the purpose of stopping a sheriff sale and to reorganize the debt secured on the property.

4. Debtor is currently in prison at the Muncy State Correctional Facility.

5. Debtor has designated a certain person as her power of attorney to make the ongoing Chapter 13 payments from two accounts that directly deposited her monthly pension and that had accumulated past social security payments.

6. Debtor contacted her bank and learned that the account that held the social security payments had been depleted and only had a remaining balance of .48 cents. Originally the account had approximately \$23,000.00. The bank statements show that many unauthorized withdraws have been made.

7. Debtor's counsel is in the process of filing a police report and to have the person that served as the power of attorney criminally charged, and to make the necessary restitution.

WHEREFORE, Debtor prays that this Honorable Court deny the Trustee's oral motion to dismiss the case.

Date: 3/21/2019

Respectfully submitted,  
/s/ Rodney D. Shepherd  
Rodney D. Shepherd, Esquire  
Attorney for the Debtor  
PA I.D. 56914  
rodsheph@cs.com

2403 Sidney Street; Suite 208  
Pittsburgh, PA 15203  
(412) 471-9670